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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 MARTINA MORALES-RIO, an individual,

12 Plaintiff,

13 v.

14 WAL-MART STORES INC., a foreign
15 corporation; DOES 1-20; and ROE
16 CORPORATIONS 1-20; inclusive

17 Defendants.

CASE NO.: 3:22-cv-00270-MMD-CSD

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT’S REPLY IN SUPPORT
OF MOTION FOR PARTIAL
SUMMARY JUDGMENT ON
CAUSATION AND DAMAGES [ECF
No. 26]**

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20 COME NOW Defendant WALMART, INC. (“Defendant”), by and through its counsel
21 of record TROY A. CLARK, ESQ., and ELEANOR D. MURPHY, ESQ., of the law firm
22 RESNICK & LOUIS, P.C., and Plaintiff MARTINA MORALES-RIO (“Plaintiff”), by and
23 through her counsel of record, JONATHAN B. LEE, ESQ., of the law firm of RICHARD
24 HARRIS LAW FIRM, and do hereby stipulate to extend the deadline for Defendant to file their
25 Reply in Support of Motion for Partial Summary Judgment on Causation and Damages [ECF No.
26 26]. Pursuant to the Local Rule IA 6-1(b), the parties hereby aver that this is the parties’ first such
27 extension requested regarding this subject. The parties are requesting an extension of 7 days, up
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1 to and including, Thursday March 2, 2023.

2 Defendant filed their Motion for Partial Summary Judgment on Causation and Damages
3 on January 19, 2023 [ECF No. 26]. Plaintiff filed her Opposition to same on February 9, 2023
4 [ECF No. 33]. Defendant's undersigned counsel of record substituted into this case in late January
5 2023 and has been working diligently to get versed in the current motion practice and discovery.
6 Defense counsel has multiple depositions during the week of February 13, 2023, in addition to
7 trial preparation, and as such the parties are hereby seeking the Court's order allowing an
8 additional 7 days' time for Defendant to file its reply brief.

9 IT IS HEREBY STIPULATED AND AGREED between the parties that Defendant shall
10 have up to and including March 2, 2023, to file their Reply in Support of Motion for Partial
11 Summary Judgment on Causation and Damages [ECF No. 26].

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13 Dated this 21st day of February, 2023

Dated this 21st day of February, 2023

14 **RESNICK & LOUIS, P.C.**

RICHARD HARRIS LAW FIRM

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16 /s/ Troy A. Clark

/s/ Jonathan B. Lee

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23 **IT IS SO ORDERED:**

24 

25 **UNITED STATES DISTRICT JUDGE**

26 **DATED:** February 22, 2023